

Exhibit M

5-18-18-MD 15-2641-Jones v Bard-Jury Trial-Day 4-A.M.-Carr-Direct

1 A. It says "partially" in the next paragraph.

2 Q. Sir, is it your testimony that retrievable filters should
3 be at least as safe and effective as permanent filters?

4 A. They are safe and effective.

5 Q. Could I have Mr. Carr's deposition, October 25, 2013, Page
6 165.

09:10AM

7 "QUESTION: And would you agree that the retrievable
8 filters ought to be at least as safe as the permanent ones?

9 "ANSWER: Yes."

10 That's testimony you gave under oath in October of
11 2013. True?

09:10AM

12 A. Yes.

13 Q. Thank you.

14 MR. LOPEZ: Your Honor, no further questions. Pass
15 the witness.

09:11AM

16 THE COURT: All right. Cross-examination?

17 MR. NORTH: Your Honor, we will reserve our
18 questioning of Mr. Carr until our case in chief.

19 THE COURT: All right. You can step down, Mr. Carr.

20 THE WITNESS: Thank you.

09:11AM

21 MR. COMBS: Your Honor, the plaintiff at this time
22 calls Dr. Derek Muehrcke.

23 THE COURT: All right. Do you have a copy of his
24 report? I didn't mention this this morning, but I think it

25 would be helpful whenever we're calling an expert -- hold on

09:12AM